

James Q. Taylor-Copeland (284743)
james@taylorcopelandlaw.com
TAYLOR-COPELAND LAW
501 W. Broadway, Suite 800
San Diego, CA 92101
Telephone: (619) 400-4944
Facsimile: (619) 566-4341

Marc M. Seltzer (54534)
mseltzer@susmangodfrey.com
Steven G. Sklaver (237612)
ssklaver@susmangodfrey.com
Oleg Elkhunovich (269238)
oelkhunovich@susmangodfrey.com
Krysta Kauble Pachman (280951)
kpachman@susmangodfrey.com
Nicholas N. Spear (304281)
nspear@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, 14th Floor
Los Angeles, CA 90067
Telephone: (310) 789-3100
Facsimile: (310) 789-3150

Attorneys for Lead Plaintiff Bradley Sostack

[Additional Counsel Included on Signature Pages]

Damien J. Marshall (*pro hac vice*)
dmarshall@kslaw.com
Andrew Michaelson (*pro hac vice*)
amichaelson@kslaw.com
KING & SPALDING LLP
1185 Avenue of the Americas, 34th Floor
New York, NY 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222

Suzanne E. Nero (284894)
snero@kslaw.com
KING & SPALDING LLP
50 California Street, Suite 3300
San Francisco, CA 94111
Telephone: (415) 318-1200
Facsimile: (415) 318-1300

*Attorneys for Defendants Ripple Labs Inc.,
XRP II, LLC, and Bradley Garlinghouse*

Meredith Dearborn (268312)
mdearborn@paulweiss.com
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
535 Mission Street, 24th Floor
San Francisco, CA 94105
Telephone: (650) 208-2788

Attorney for Christian Larsen

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

In re RIPPLE LABS INC. LITIGATION,

DISCOVERY MATTER

Case No. 18-cv-06753-PJH

This Document Relates To:
ALL ACTIONS

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME OF
MOTION FOR RELIEF FOR
CHRISTIAN LARSEN**

1 Pursuant to Civ. L.R. 6-2, Lead Plaintiff Bradley Sostack (“Plaintiff”), Defendants Ripple
2 Labs Inc, XRP II, LLC, and Bradley Garlinghouse (collectively, “Defendants”), and Christian
3 Larsen hereby stipulate as follows:

4 **WHEREAS**, on April 28, 2022, the Court ordered that Defendants produce all documents
5 and written discovery produced in *Securities and Exchange Commission v. Ripple Labs, Inc.*, 20
6 Civ. 10832 (AT), S.D.N.Y) (the “SEC Action”) and that Plaintiff must provide notice to all
7 relevant third parties who have not previously consented to production within seven days of the
8 Order (the “April 28, 2022 Order”);

9
10 **WHEREAS**, in the April 28, 2022 Order, the Court also ordered that any third party who
11 does not consent to production must notify both Plaintiff and Defendants of their intent to object
12 within fourteen days of receipt of the notice and must file any motion for relief within twenty-one
13 days of receipt of such notice;

14 **WHEREAS**, on May 4, 2022, Plaintiff provided notice of the April 28, 2022 Order to Mr.
15 Larsen, a third party in this matter and a defendant in the SEC Action;

16
17 **WHEREAS**, Mr. Larsen timely notified Plaintiff and Defendants of his intent to object to
18 production by May 18, 2022, and any motion for relief is due on May 25, 2022;

19 **WHEREAS**, Plaintiff and Mr. Larsen are in the process of meeting and conferring about
20 the documents that Mr. Larsen will produce to Plaintiff pursuant to the April 28, 2022 Order;

21 **WHEREAS**, the parties request to extend the May 25, 2022 deadline for Mr. Larsen to
22 seek relief from the Court to allow the parties to continue to meet and confer productively; and

23 **WHEREAS**, granting this extension is not expected to affect the schedule for the matter.

24 **NOW, THEREFORE, IT IS HEREBY STIPULATED** by and between Lead Plaintiff,
25 Defendants, and Mr. Larsen, through their respective counsel, that:
26
27
28

1 1. Mr. Larsen's deadline to move the Court for relief from its April 28, 2022 Order is
2 extended until June 24, 2022.

3 Dated: May 23, 2022

By: /s/ Nicholas N. Spear
James Q. Taylor-Copeland (284743)
james@taylorcopelandlaw.com
TAYLOR-COPELAND LAW
501 W. Broadway, Suite 800
San Diego, CA 92101
Telephone: (619) 400-4944
Facsimile: (619) 566-4341

Marc M. Seltzer (54534)
mseltzer@susmangodfrey.com
Steven G. Sklaver (237612)
ssklaver@susmangodfrey.com
Oleg Elkhunovich (269238)
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Krysta Kauble Pachman (280951)
kpachman@susmangodfrey.com
Nicholas N. Spear (304281)
nspear@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, 14th Floor
Los Angeles, CA 90067
Telephone: (310) 789-3100
Facsimile: (310) 789-3150

P. Ryan Burningham (*pro hac vice*)
rburningham@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1201 Third Avenue, Suite 3800 Seattle, WA 98101
Telephone: (206) 516-3880
Facsimile: (206) 516-3883

Attorneys for Lead Plaintiff Bradley Sostack

20 Dated: May 23, 2022

By: /s/ Suzanne Nero
Damien J. Marshall (*pro hac vice*)
dmarshall@kslaw.com
Andrew Michaelson (*pro hac vice*)
amichaelson@kslaw.com
KING & SPALDING LLP
1185 Avenue of the Americas, 34th Floor
New York, NY 10036
Telephone: (212) 556-2100
Facsimile: (212) 556-2222

Suzanne E. Nero (284894)
snero@kslaw.com
KING & SPALDING LLP
50 California Street, Suite 3300

San Francisco, CA 94111
Telephone: (415) 318-1200
Facsimile: (415) 318-1300

Andrew J. Ceresney (*pro hac vice*)
aceresney@debevoise.com
DEBEVOISE & PLIMPTON LLP
919 Third Avenue
New York, NY 10022
Telephone: (212) 909-6000
Facsimile: (212) 909-6836

*Attorneys for Defendants Ripple Labs Inc.,
XRP II, LLC, and Bradley Garlinghouse*

Dated: May 23, 2022

By: /s/ Meredith Dearborn
Meredith Dearborn (268312)
mdearborn@paulweiss.com
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP
535 Mission Street, 24th Floor
San Francisco, CA 94105
Telephone: (650) 208-2788

Attorney for Christian Larsen

[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3) regarding signatures, I attest that concurrence in the filing of this document has been obtained from the other signatories.

DATED: May 23, 2022.

/s/ Nicholas N. Spear

Nicholas N. Spear